

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

1. SUSAN MCKENZIE-NEVOLAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-12-570-D
	)	Honorable Timothy D. DeGiusti
1. DEACONESS HOLDINGS, LLC,	)	
d/b/a DEACONESS HOSPITAL	)	
	)	
Defendant.	)	

**DEFENDANT’S WITNESS AND EXHIBIT LIST**

The Defendant, Deaconess Holdings, LLC, hereby submits its Witness and Exhibit List.<sup>1</sup>

**DEFENDANT’S DESIGNATION OF  
WITNESSES EXPECTED TO BE CALLED**

1	Erin Larson c/o Strecker & Associates	Will testify regarding communications with Plaintiff and communications with other employees; Defendant’s business operations; events surrounding Plaintiff’s claims; Plaintiff’s employment, job performance, conduct, disciplinary notices, and resignation; and select policies, practices, and procedures of Defendant.
2	Rhonda Bowman c/o Strecker & Associates	Will testify regarding select policies, practices and procedures of Defendant; wages and benefits of Defendant’s employees; events surrounding Plaintiff’s claims; events and circumstances surrounding Plaintiff’s resignation; communications with Plaintiff and communications with other employees; and Defendant’s business operations.
3	Karissa Mills c/o Strecker	Will testify regarding communications with Plaintiff and communications with other employees; Defendant’s business

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<sup>1</sup> Defendant reserves the right to supplement as additional witnesses are discovered and additional documents are provided.

	& Associates	operations; events surrounding Plaintiff's claims; Plaintiff's employment, job performance, conduct; and Defendant's select policies, practices, and procedures.
4	Dr. Michael Winzenread	Will testify regarding communications with Plaintiff and communications with other employees; Defendant's business operations; events surrounding Plaintiff's claims; and Plaintiff's employment, job performance, and conduct.
5	Dr. Farhan M. Qureshi Integris Canadian Valley, 1205 Health Center Parkway, Suite 210, Yukon, OK 73099	Dr. Qureshi is a treating physician of Plaintiff and may testify as to services rendered to Plaintiff including treatment and diagnosis, billing of services rendered to Plaintiff, appointment times/days, correspondence regarding Plaintiff, time off from work slips, return to work slips, communications with Plaintiff, and previous employment of Plaintiff.
6	Donna Killough Integris Canadian Valley, 1205 Health Center Parkway, Suite 210, Yukon, OK 73099	Ms. Killough may testify as to Plaintiff's appointment days/times, Plaintiff's medical records, Plaintiff's requests to be off work, Plaintiff's return to work slips, communications with Plaintiff, and Plaintiff's previous employment at Dr. Qureshi's office.
7	Records Custodian at Dr. Farhan Qureshi's Office, 1205 Health Center Parkway, Suite 210, Yukon, OK 73099	This individual may testify as to Plaintiff's appointment days/times, Plaintiff's medical records, Plaintiff's requests to be off work, Plaintiff's return to work slips, billing of services rendered to Plaintiff, billing of services rendered to Plaintiff's insurance company, Plaintiff's Explanation of Benefits, and records pertaining to Plaintiff's previous employment at Dr. Qureshi's office.
8	Susan Nevolas c/o Hammons, Gowens, Hurst &	May testify as to the facts regarding her employment with Defendant, the allegations contained in the Complaint, her job duties, her medical records, her requests for time off work, her medical appointments, the events surrounding her decision to leave the Hospital.

	Associates	
9	Morey Villareal c/o Strecker & Associates	Mr. Villareal will testify as to Plaintiff's failure to mitigate her damages.

**DEFENDANT'S DESIGNATION OF  
WITNESSES WHO MAY BE CALLED**

10	Dr. Brady S. Hagood, Integris Canadian Valley, 1205 Health Center Parkway, Suite 110, Yukon, OK 73099	Dr. Haygood may testify as to services rendered to Plaintiff including treatment and diagnosis, appointment times/days, and communications with Plaintiff.
11	Dr. Carla W. Werner c/o Strecker and Associates, P.C.	Dr. Werner may testify as to services rendered to Plaintiff including treatment and diagnosis, appointment times/days, and communications with Plaintiff.
12	Dr. Donna Seres, OKC Gynecology & Obstetrics, 11200 N. Portland, 2 <sup>nd</sup> Floor, Oklahoma City, OK 73120	Dr. Seres may testify as to services rendered to Plaintiff including treatment and diagnosis, appointment times/days, and communications with Plaintiff.
13	Any witnesses listed by Plaintiff and not objected to by Defendant	
14	Any witnesses necessary for impeachment or rebuttal	

**DEFENDANT'S DESIGNATION OF EXHIBITS EXPECTED TO BE  
USED**

No.	Exhibit	Bates No.
1	Hand Book Receipt and Acknowledgement 1/25/10	D (N) 000498
2	Job Description of Medical Assistant	D (N) 000038-000039
3	Employee Disciplinary Action Notice 8/11/10	D (N) 000002-000007
4	Employee Disciplinary Action Notice 12/13/10	D (N) 000008-000019
5	Employee Disciplinary Action Notice 12/13/10 (w/ Plaintiff's handwriting)	D (N) 000022-000030
6	Compliance Disclosure Upon Separation	D (N) 000031-000034
7	Plaintiff's Resignation Letter	D (N) 000035
8	Charge of Discrimination	D (N) 000058
9	Policy B.2 Attendance Policy	D (N) 000089-000091
10	Termination Meeting Notes	D (N) 000113
11	Imaging Report and Letter 12/7/10	D (N) 000179-000180
12	Letter from Dr. Qureshi 12/15/10	D (N) 000181
13	Letter from Dr. Qureshi 12/21/10	D (N) 000238
14	Release to Return to Work 12/23/10	D (N) 000239
15	Release to Return to Work 1/18/11	D (N) 000243
16	Release to Return to Work 1/24/11	D (N) 000244
17	Release to Return to Work 12/23/10	D (N) 000630
18	Release to Return to Work 1/18/11	D (N) 000631
19	Time Records of Plaintiff	D (N) 000287-000317
20	Calendar	D (N) 000363-000379
21	Hand Written Note by Plaintiff	D (N) 000381
22	Advanced Notice Request for Time Off 1/18/11	D (N) 000632
23	Advanced Notice Request for Time Off 1/10/11	D (N) 000633
24	Advanced Notice Request for Time Off 1/14/11	D (N) 000634
25	Advanced Notice Request for Time Off 1/19/11	D (N) 000635
26	Advanced Notice Request for Time Off 12/27/10	D (N) 000627
27	Advanced Notice Request for Time Off 12/27/10	D (N) 000628
28	Policy B.7 Discipline and Termination	D (N) 000786-000791
29	Deaconess Hospital Handbook	D (N) 000834-000887
30	Email Between Larson and Plaintiff 01/10/11	D (N) 000900
31	Email Between Larson and Plaintiff 01/19/11	D (N) 000926
32	Email Between Larson and Bowman 1/25/11	D (N) 000895
33	Meeting Agenda 08/18/10	D (N) 001406-001410
34	Meeting Agenda 12/15/10	D (N) 001411-001414
35	Medical Records Deaconess Hospital	D (N) 001612-001637,

		001678-001734
36	Medical Records Dr. Farhan Qureshi	D (N) 001638-001677
37	Plaintiff's Personnel Calendar	Plf. Nevolas 327-341
38	Medical Records Dr. Brady Haygood	D (N) 001952-001954
39	Time Exceptions Forms in Plaintiff's Personnel File	
40	Expert Report of Morey Villareal	

### **DEFENDANT'S DESIGNATION OF EXHIBITS THAT MAY BE USED**

41	Plaintiff's Candidate File	D (N) 000064-000071
42	OESC Document of Appeal	D (N) 000109-000110
43	OESC Fact Finding Questions and Documents	D (N) 000121-000138
44	Excuse Slips	D (N) 000166-000178
45	Excuse Slips/Return to Work Slips	D (N) 000248-000267, 000236-000237, 000729-730, 000753, 000760-000762
46	Interview Protocol Clinical	D (N) 000382-000385
47	Non-Work Related Illness Policy	D (N) 000405-000406
48	Plaintiff's Personnel Documents	D (N) 00410-000472
49	Community Cares Pledge 1/25/10	D (N) 000490
50	Acknowledgement Code of Conduct	D (N) 000498
51	Policy A.1 Employment Policy	D (N) 000798
52	Policy B.3 Harassment Disruptive Behavior	D (N) 000799-000803
53	Deaconess Hospital Handbook	D (N) 000805-000833
54	Email Between Koontz and Bowman 2/25/10	D (N) 000901-000902
55	Email Between Larson and Plaintiff 11/17/10	D (N) 000909
56	Email Between Larson and Plaintiff 08/04/10	D (N) 000915
57	Email Between Larson and Plaintiff 10/18/10	D (N) 000922
58	Email Between Larson and Plaintiff 10/22/10	D (N) 000923
59	Email Between Bowman and Larson 01/19/11	D (N) 000928
60	Email Between Bowman and Larson 12/13/10	D (N) 000899
61	Email Between Bowman and Larson 12/16/10	D (N) 000890
62	Email Between Bowman and Larson 12/17/10	D (N) 000891
63	Email Between Bowman, Larson, Mills	D (N) 000893
64	Emails Between Mills and Larson 1/25/11	D (N) 000896-000897
65	Emails Between Larson and IT Service Desk 1/26/11	D (N) 000938
66	EEOC Response to Subpoena	D (N) 001735-001944

67	Plaintiff's W-2s	Plf. Nevolas 002-009
68	Emails Plaintiff Produced	Plf. Nevolas 010-044, 054-057, 114
69	Time Exception Forms Produced by Plaintiff	Plf. Nevolas 045-053, 058-059
70	Time Cards Plaintiff Produced	Plf. Nevolas 060-102
71	Micheal Winzenread Scheduled December 13 <sup>th</sup>	Plf. Nevolas 117, 122
72	Plaintiff's Produced Calendar Notes	Plf. Nevolas 133,140
73	Documents Plaintiff Produced from Her EEOC and OESC Files	Plf. Nevolas 145-187
74	Medical Records Plaintiff Produced	Plf. Nevolas 222-283
75	Plaintiff's Phone Records	Plf. Nevolas 284-319
76	Plaintiff's Short-term Disability Application	Plf. Nevolas 320-321
77	Plaintiff's Resume	Plf. Nevolas 322
78	Letters of Recommendation	Plf. Nevolas 323-325
79	Plaintiff's Expert Report	
80	Affidavits Given By Witnesses to Which Defendant Does Not Object	
81	Documents Used for Impeachment to Which Defendant Does Not Object	
82	Written Discovery Responses	
83	Further Documents Identified During Discovery to Which Defendant Does Not Object	
84	Portions of Depositions to Which Defendant Does Not Object	
85	Documents Identified by Plaintiff to Which Defendant Does Not Object	
86	Documents Produced by Defendant	
87	Documents Produced by Plaintiff to Which Defendant Does Not Object	
88	Demonstrative Exhibits, Summaries, and Time Lines	
89	Exhibits Listed By Plaintiff and Not Objected to By Defendant	

Respectfully submitted,

**STRECKER & ASSOCIATES, P.C.**

*/s/ Jessica Ridenour*

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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**ATTORNEYS FOR PLAINTIFF**

s/ Jessica Ridenour  
Jessica Ridenour